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Ticona

June 18, 2012
EIJ-043-12
TPI Project – 07082011-MISC

Air/Toxics & Inspection
Coordination Branch

6EN-A

Bishop Facility
Highway 77 South
P.O. Box 428
Bishop, TX 78343

Certified Mail
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Mr. David Eppler
Air Toxics and Inspection Coordination Branch
U.S.EPA Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

Subject: **Clean Air Act ("CAA") Section 114 Information Request –
Supplemental Monthly Response**

Dear Mr. Eppler,

As agreed to during our meeting on December 20, 2011, Ticona Polymers, Inc. (TPI) is submitting the following update relating to the EPA's Section 114 Information Request. The team continues to work diligently on this project and will provide the next update by July 9, 2012.

Ticona Polymers Inc. engineering staff has conducted an analysis of the MO-3 and MO-4 flare hydraulics to identify what changes may be necessary to assure the required minimum BTU value is achieved.

The results of this analysis confirm that, with a hydrogen heating value of 1,212 BTU/scf, the MO-3 flare will be able to operate at the required 300 BTU/scf net heating value. In reviewing the flare specifications, approximately 336 BTU/scf is needed to maintain the required minimum heating value, and the MO-3 flare currently operates with approximately 341 BTU/scf, without any changes.

Using the hydraulics data and the same hydrogen heating value, the MO-4 flare will require piping modifications to achieve the required minimum heating value. The value required to maintain 300 BTU/scf is approximately 342 BTU/scf. With the current configuration of the MO-4 flare, the maximum heating value which may be achieved is approximately 312 BTU/scf. By replacing approximately 300 feet of 6-inch pipe with 8-inch pipe and a re-sized control valve, the natural gas flow rate to the flare can reach 580 Mscfh, exceeding the 550 Mscfh flow required to meet or exceed 342 BTU/scf.

The proposed path forward is to fabricate and install approximately 300 feet of piping alongside the existing piping. A tie-in is planned for the next scheduled unit shut down when the flare will not be in service. A survey will also be conducted to determine if the pressure regulators at the natural gas breakdown station will provide enough gas for all units.

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GUR flare –TPI has been in contact with John Zink, the GUR flare manufacturer, to determine the appropriate steam to vent gas ratio for that flare. TPI has provided the flare manufacturer with information they requested, and the manufacturer recently requested additional operational data. TPI has submitted this information, and is currently waiting for the manufacturer's reply.

Should you have any questions or need additional information, please contact me at (361) 584-6104.

Sincerely,

A handwritten signature in black ink, appearing to read "Buddy Joyner", with a long horizontal flourish extending to the right.

Buddy Joyner
Sr. Environmental Specialist II